

Exhibit 17

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RVRG HOLDINGS LLC,

Plaintiff

v.

HANGZHOU TAOHAOWU TECHNOLOGY CO.,
LTD., HONG KONG ALLCHINABUY CO.,
LIMITED and UK ALLCHINABUY CO., LIMITED,

Defendants

CIVIL ACTION NO.

COMPLAINT

Jury Trial Requested

17. The Rhude Marks are currently in use in commerce in connection with the Rhude Products. The Rhude Marks were first used in commerce on or before the dates of first use as reflected in the respective registrations attached hereto as **Exhibit B**.

18. The success of the Rhude Products is due in part to Rhude's marketing and promotional efforts. These efforts include advertising and promotion through social media, Rhude's website (available at <https://rh-ude.com>) and print and internet-based advertising.

19. Rhude's success is also due to its use of the highest quality materials and processes in making the Rhude Products.

20. Additionally, Rhude owes a substantial amount of the success of the Rhude Products to its consumers and word-of-mouth buzz that its consumers have generated.

21. Rhude's efforts, the quality of Rhude's products and the word-of-mouth buzz generated by its consumers have made the Rhude Marks and Rhude Products prominently placed in the minds of the public. Members of the public and retailers have become familiar with the Rhude Marks and Rhude Products and have come to associate them exclusively with Rhude. Rhude has acquired a valuable reputation and goodwill among the public as a result of such associations.

22. Rhude has gone to great lengths to protect its interests in the Rhude Products and the Rhude Marks. No one other than Rhude and its authorized licensees and distributors are authorized to manufacture, import, export, advertise, offer for sale or sell any goods utilizing the Rhude Marks, or use the Rhude Marks in connection with goods or services or otherwise, without the express permission of Rhude.

Defendants' Wrongful and Infringing Conduct

23. AllChinaBuy is an online shopping platform that aids consumers wishing to purchase goods on popular Chinese ecommerce platforms such as 1688, Taobao and Tmall which are notably directed towards businesses and consumers based in China and do not ship products

directly to the U.S. AllChinaBuy specifically targets U.S. consumers by translating Merchant Storefronts on the China Focused Marketplace Platforms from Chinese to English to enable U.S. consumers to shop on these platforms.² Consumers without access to Merchant Storefronts on the China Focused Marketplace Platforms, search for and identify items they wish to purchase via the translated listings on AllChinaBuy, and Defendants then purchase the product and direct shipment to their warehouse(s) in China. Once Defendants receive the shipments, they unpackage, photograph and send the photographs to the end consumer for review and approval. Upon approval and receipt of shipping instructions from the consumer, Defendants repackage the product(s) and ships the product(s) to the consumers located in the U.S., including New York.

24. AllChinaBuy boasts “AllChinaBuy is committed to offering ingenious services to all our users around the world!”³

25. While, upon information and belief, Defendants do not manufacture their own products, with direct knowledge of their infringing conduct, they locate, consolidate, market, promote, offer for sale, sell, purchase, open, photograph, warehouse, repackage, ship, export and/or otherwise facilitate the sale of counterfeit products to consumers throughout the U.S., including New York, to their direct financial benefit.

26. AllChinaBuy’s presence in the international market has recently boomed due to its presence on popular social media and video platforms such as TikTok, YouTube, Instagram, Reddit and Discord (“Media Platforms”), where social media influencers “unbox” (i.e., document themselves via video recording opening, displaying and reviewing the contents of a package received) various counterfeit products obtained from AllChinaBuy.

² *How to Purchase*, ALLCHINABUY, https://www.allchinabuy.com/en/page/noviceguide/?htag=pc.en.banner_main.1 (last visited Oct. 29, 2024).

³ *Help Center*, ALLCHINABUY, https://www.allchinabuy.com/en/page/help/#p1118_1119_helpId3441 (last visited Oct. 29, 2024).